IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

VICENTE ROMERO PEREZ

DEBTOR

CASE NO 06-04526 SEK

CHAPTER 13

MOTION AND NOTICE OF FILING OF POST-CONFIRMATION MODIFICATION OF CHAPTER 13 PLAN

TO THE HONORABLE COURT:

NOW COMES, **VICENTE ROMERO PEREZ**, through the undersigned attorney, and very respectfully states and prays as follows:

1. Debtor is hereby submitting a Post-confirmation Modification of Chapter 13 Plan, dated September 18, 2008, herewith and attached to this motion.

2. This post-confirmation Plan is filed to reduce the Plan base and monthly payment because the debtor retired from the US Postal Service and his actual reduced income comes from a retirement pension.

NOTICE TO CREDITORS AND PARTIES IN INTEREST

NOTICE IS HEREBY GIVEN, that debtor proposed post-confirmation Plan is hereby circulated to all creditors and parties in interest. You are hereby notifying that you have twenty (20) days to reject the proposed modification of this Plan and request a hearing.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor, Vicente Romero Perez; and parties in interest in the present case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of September, 2008.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
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United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. **06-4526**

ROMERO PEREZ, VICENTE

Chapter **13**

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☑ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: **9/18/2008**   ☐ AMENDED PLAN DATED: _____
   ☐ PRE ☑ POST-CONFIRMATION   Filed by: ☐ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

$ 850.00 x   21 = $ 17,850.00
$ 0.00 x   1 = $ 0.00
$ 600.00 x   38 = $ 22,800.00
$ _____ x _____ = $ _____
$ _____ x _____ = $ _____

TOTAL: $ **40,650.00**

Additional Payments:
$ _____ to be paid as a LUMP SUM
within _____ with proceeds to come from:

☐ Sale of Property identified as follows:

_____

_____

☐ Other:

_____

_____

Periodic Payments to be made other than, and in addition to the above:
$ _____ x _____ = $ _____

PROPOSED BASE: $ **40,650.00**

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: $ **2,654.00**

Signed: _Vicente Romero_
     Debtor

_____
     Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR ___ $ _____
B. SECURED CLAIMS:
☐ Debtor represents no secured claims.
☑ Creditors having secured claims will retain their liens and shall be paid as follows:
1. ☐ Trustee pays secured ARREARS:
Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
$ _____ $ _____ $ _____
2. ☑ Trustee pays IN FULL Secured Claims:
Cr. **TREASURY DEPT.** Cr. _____ Cr. _____
AS PER STIPULATIC # _____ # _____
$ **30,182.79** $ _____ $ _____
3. ☐ Trustee pays VALUE OF COLLATERAL:
Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
$ _____ $ _____ $ _____
4. ☑ Debtor SURRENDERS COLLATERAL to Lien Holder:
    COOP A/C MAUNAB   **NAPUS FCU (5)**
5. ☐ Other:

_____

6. ☑ Debtor otherwise maintains regular payments directly to:
    BANCO SANTANDEI
C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
11 U.S.C. § 507 and § 1322(a)(2)
D. UNSECURED CLAIMS: Plan ☐ Classifies ☑ Does not Classify Claims.
1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____
         ☐ Paid 100% / ☐ Other: _____
Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
$ _____ $ _____ $ _____
2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (*Executory contracts; payment of interest to unsecureds, etc.*)
*Or as otherwise specified on proof of claim.
Late filed claims filed by creditors will receive no distribution.
"Surrenders collateral": Shares/savings in any
Cooperativa/Association/Bank.
Debtor reserves the right to object claims after plan confirmation.

Attorney for Debtor **R. Figueroa Carrasquillo Law Office** _____ Phone: **(787) 744-7699**

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PO BOX 127
MAUNABO, PR 00707-0127

DEPARTMENT OF JUSTICE
FEDERAL LITIGATION DIVISION
PO BOX 9020192
SAN JUAN, PR 00902-0192

FIRST BANK- AUTO
PO BOX 13817
SAN JUAN, PR 00908-3817

INTERNAL REVENUE SERVICE
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2 AVE PONCE DE LEON STOP 27
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